

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	
	§	Chapter 7
Douglas Alvin Francis	§	
Marylynn C Francis,	§	Case No. 21-51318-cag
	§	
Debtors.	§	
<hr style="width: 40%; margin-left: 0;"/>		
Marylynn Cravotta Francis,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Adversary No. 22-05047-cag
	§	
FedLoan Servicing, Educational Credit	§	
Management Corporation, Navient	§	
Solutions, LLC, and the United States	§	
Department of Education,	§	
	§	
Defendants.	§	

**UNITED STATES OF AMERICA'S (DEPARTMENT OF EDUCATION)
ANSWER TO COMPLAINT TO DETERMINE DISCHARGEABILITY OF DEBT
PURSUANT TO SECTION 523 (a) (8)**

The United States of America, on behalf of the Department of Education (“DOE”),
files this answer to Plaintiff’s complaint and asserts:

1. Admits.
2. Admits.
3. Denies for lack of knowledge.
4. Denies for lack of knowledge.
5. Denies for lack of knowledge.
6. Admits except alleges that for proper service, the United States Attorney and the
United States Attorney General must also be served.

7. Admits.
8. Admits.
9. Admits.
10. Denies for lack of knowledge the first sentence, admits the last sentence.
11. Admits Debtor has several loans guaranteed by the United States and the current balance is approximately \$75,000.00.
12. Denies for lack of knowledge or information.
13. Denies for lack of knowledge or information except admits that collection of student loans has been deferred due to the Covid epidemic.
14. Admits the first sentence, denies the second sentence for lack of knowledge and admits the last sentence.
15. Admits the first sentence, denies the remainder of the paragraph for lack of knowledge.
16. Admits the first and second sentences, denies the third and fourth sentences for lack of knowledge and no response required for the remainder of the paragraph.

Respectfully submitted,

ASHLEY C HOFF
UNITED STATES ATTORNEY

By: /s/Steven B. Bass
STEVEN B. BASS
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Counsel for the United States of America

CERTIFICATE OF SERVICE

I hereby certify that on September 6, 2022, a true and correct copy of the above and foregoing “United States of America’s (Department of Education) Answer to Complaint to Determine Dischargeability of Debt Pursuant to Section 523(a)(8)” was served via this Court’s CM/ECF notification upon all parties requesting such notice in this proceeding, and that copies were served by U.S. First Class Mail, postage prepaid, as follows:

Marylynn Cravotta Francis
165 Harbor Breeze
Lakehills, TX 78063
Via U.S. First Class Mail

Nicholas C. Inman
Allmand Law
860 Airport Freeway, Suite 401
Hurst, TX 76054
Via E-mail, NInman@Allmandlaw.com

/s/Steven B. Bass

STEVEN B. BASS

Assistant United States Attorney